

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

LWRC INTERNATIONAL, LLC  
815 Chesapeake Drive  
Cambridge, MD 21613

Plaintiff,

v.

SIG SAUER, INC.  
18 Industrial Drive,  
Exeter, NH 03833-4557

Defendant.

Civil Action No.

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff LWRC International, LLC ("LWRCI"), by its undersigned counsel, for its complaint against Defendant Sig Sauer, Inc. ("Sig Sauer"), states and alleges:

**NATURE OF THE CASE**

1. This is an action for injunctive relief and damages for patent infringement in violation of 35 U.S.C. § 271 *et seq.*

**PARTIES**

2. LWRCI is a Maryland limited liability company having its principal place of business at 815 Chesapeake Drive, Cambridge, Maryland 21613.

3. Sig Sauer is a Delaware corporation having its principal place of business at

18 Industrial Drive, Exeter, NH 03833.

LAW OFFICES  
WEBB, BURNETT,  
CORNBROOKS, WILBER,  
VORHIS, DOUSE  
& MASON, LLP  
P. O. BOX 910  
SALISBURY, MARYLAND  
AREA CODE 410  
TELEPHONE 742-3176

**JURISDICTION AND VENUE**

4. This Court has jurisdiction over the subject matter of this controversy pursuant to 28 U.S.C. §1338(a).

5. On information and belief, Sig Sauer is manufacturing, selling and offering for sale the accused infringing rifles and their associated infringing gas operating system, including rifle models #SIG516 PATROL and #SIG516 PRECISION MARKSMAN, within Maryland and within this judicial District. Such rifles are being sold and offered for sale within Maryland and this judicial District.

**PATENT INFRINGEMENT**

6. LWRCI is the owner of United States Patent No. 7,461,581 (“the ‘581 patent”), entitled “Self-Cleaning Gas Operating System For A Firearm” and has the right to sue for infringement and collect damages for such infringement. The ‘607 patent issued on December 9, 2008. A copy of the ‘581 patent is attached hereto as Exhibit A.

7. Defendant Sig Sauer has been and is infringing, contributing to the infringement of, and/or inducing the infringement of the ‘581 patent by, among other things, making, using, selling, and/or offering for sale autoloading rifles with their associated gas operating system, including rifle models #SIG516 PATROL and #SIG516 PRECISION MARKSMAN, within the territorial boundaries of the United States and this judicial District without the consent, license or authorization of LWRCI, and will continue to do so unless enjoined by this Court.

8. Upon information and belief, Defendant Sig Sauer’s infringement of the ‘581 patent

has been and is willful.

LAW OFFICES  
WEBB, BURNETT,  
CORNBROOKS, WILBER,  
VORHIS, DOUSE  
& MASON, LLP  
P. O. BOX 910  
SALISBURY, MARYLAND  
AREA CODE 410  
TELEPHONE 742-3176

9. Plaintiff LWRCI has suffered and will continue to suffer irreparable injury and financial damage for which LWRCI is entitled to damages for infringement, which damages shall be trebled, and for which LWRCI is entitled to a preliminary and permanent injunction against further infringement.

10. By this Complaint, Plaintiff LWRCI does hereby comply with the notice requirements of 35 U.S.C. §287 with respect to the '581 patent.

**JURY DEMAND**

Pursuant to Fed. R. Civ. P. 38, Plaintiff demands a trial by jury on all issues properly triable by a jury in this action.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff LWRCI prays for a judgment in its favor and against Defendant Sig Sauer as follows:

- A. that Defendant Sig Sauer be adjudged to have infringed the '581 patent;
- B. that Defendant Sig Sauer and its officers, agents, servants, employees, attorneys and those persons in active concert or participation with it, be preliminarily and permanent enjoined from directly or indirectly infringing the '581 patent;
- C. that Plaintiff LWRCI be awarded its damages, together with interest and costs, pursuant to 35 U.S.C. § 284, and that such damages be trebled;
- D. that Plaintiff LWRCI be awarded reasonable attorneys' fees pursuant to 35 U.S.C. § 285; and

E. that Plaintiff LWRCI have such other and further relief as the Court shall deem just and proper.

/s/

K. King Burnett (Bar No. 00870)  
[kburnett@webbnetlaw.com](mailto:kburnett@webbnetlaw.com)  
WEBB, BURNETT, CORNBROOKS, WILBER,  
VORHIS, DOUSE & MASON, LLP  
115 Broad Street  
Salisbury, Maryland 21803  
Telephone: (410) 742-3176  
Facsimile (410) 742-0438

Harvey B. Jacobson, Jr.  
Michael R. Slobasky  
Philip L. O'Neill (Bar No. 08083)  
JACOBSON HOLMAN PLLC  
400 Seventh St., N.W.  
Washington, D.C. 20004  
Telephone: (202) 638-6666  
Facsimile: (202) 393-5350

ATTORNEYS FOR PLAINTIFF  
LWRC INTERNATIONAL, LLC

January 18, 2011

LAW OFFICES  
WEBB, BURNETT,  
CORNBROOKS, WILBER,  
VORHIS, DOUSE  
& MASON, LLP  
P. O. BOX 910  
SALISBURY, MARYLAND  
AREA CODE 410  
TELEPHONE 742-3176